

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KING COUNTY, WASHINGTON, IOWA	: 1:09-CV-08387 (SAS)
STUDENT LOAN LIQUIDITY CORPORATION,	:
Together and on Behalf of All Others	:
Similarly Situated, et ano.,	:
	:
Plaintiffs,	: NOTICE OF MOTION OF
	: DEFENDANT WINFRIED REINKE
-against-	: <u>TO DISMISS THE COMPLAINT</u>
	:
IKB DEUTSCHE INDUSTRIEBANK AG, et al.,	:
	:
Defendants.	:
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PLEASE TAKE NOTICE that, upon the annexed declarations of Winfried Reinke, dated September 13, 2010, and Fran M. Jacobs, dated September 14, 2010, along with the exhibits thereto, and all the pleadings and proceedings herein, defendant Winfried Reinke (“Reinke”), by his attorneys, will move this Court before the Hon. Shira A. Scheidlin, in the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY, at a date and time to be determined, for an order dismissing Plaintiffs’ First Amended Complaint (the “Complaint”) pursuant to Fed. R. Civ. P. 12(b)(2) on the ground that the Court lacks personal jurisdiction over Reinke and pursuant to Fed. R. Civ. P. 9(b) and 12(b)(6) on the ground that the Complaint fails to plead fraud with particularity and fails to state a claim upon which relief can be granted; and granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to agreement, answering papers, if any, shall be served and filed on or before October 14, 2010.

PLEASE TAKE FURTHER NOTICE that, pursuant to agreement, reply papers, if any, shall be served and filed on or before November 4, 2010.

Dated: New York, NY
September 14, 2010

DUANE MORRIS LLP

By: /s/ Fran M. Jacobs
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